

EXHIBIT

1

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL P. GILBERT,)	
)	
PLAINTIFF,)	
)	Civil Action No. 17-cv-02505
v.)	
)	
ARMOR SYSTEMS CORPORATION,)	Hon. Judge Robert W. Gettleman
)	
DEFENDANT.)	

AFFIDAVIT OF TIFFANY LACASSE

I, Tiffany LaCasse, am employed by Armor Systems Corporation ("Armor") as a Compliance Officer. I am over eighteen (18) years of age and capable and fully competent to make this affidavit and testify as to the matters stated in this affidavit. The facts in this affidavit are within my personal knowledge as a Compliance Officer and are true and correct. If called to testify, I could competently testify to the following facts:

1. Armor Systems Corporation is an Illinois Corporation with its principal place of business located at 1700 Kiefer Drive, Suite 1, Zion, Illinois 60099.
2. In the performance of my duties, I am custodian of records as I have under my direct custody and control the business records regarding Plaintiff's account and communications with Plaintiff, including Exhibit A and Exhibit B to this affidavit.
3. The records of Armor, including Exhibit A and Exhibit B attached to this affidavit, are made and kept in the ordinary course of business by such persons who have a business duty to my employer to make such records as a regular practice. The records were made at or near the time of occurrence of the event or events of which they are a record, or from information transmitted, by a person with knowledge of the event or events recorded. I

have personally reviewed Armor's records as they relate to Plaintiff and I made this affidavit based upon that personal review. Those records are attached hereto as Exhibit A and Exhibit B.

4. On or about May 13, 2013, Defendant's client Village of Round Lake Park Police Department ("Village of Round Lake") placed an unpaid parking ticket belonging to Plaintiff with Defendant for collection purposes.
5. On or about September 19, 2013, Armor's client, College of Lake County, placed a delinquent account belonging to Plaintiff with Armor for collection purposes.
6. On or about July 3, 2018, Plaintiff called Armor requesting information regarding the College of Lake County account that he noticed on his credit report. A true and accurate copy of the account notes for Plaintiff's accounts are attached hereto as Exhibit B.
7. Both the College of Lake County and the Village of Round Lake accounts were discussed with Plaintiff on this phone call. However, the Village of Round Lake account was not reported to the credit bureaus.
8. On this call, Plaintiff requested a letter so that he could start making payments.
9. On or about July 5, 2018, Armor sent a single collection letter to Plaintiff requesting payment on the two accounts placed with Defendant for collection. A true and accurate copy of the letter is attached hereto as Exhibit A.
10. This letter was not the initial validation notice sent on the accounts.
11. It is Armor's policy to issue an initial validation letter when an account is placed with it for collection.
12. Armor sends separate initial validation notices for each account.
13. Only secondary collection notices combine accounts into one notice.

14. On or about July 24, 2018, Plaintiff called Defendant and stated that he did not want to pay on the College of Lake County account yet. *See*, Ex. B.

I declare under penalty of perjury that the foregoing is true and correct.



Tiffany LaCasse
Compliance Officer
Armor Systems Corporation
1700 Kiefer Drive, Suite 1
Zion, IL 60099

Sworn to and subscribed before me on this 24th day of April, 2019.







Notary Public



EXHIBIT

A

1700 Kiefer Drive, Suite 1
Zion, IL 60099-5105

IF PAYING BY CREDIT CARD, FILL OUT BELOW - CHECK CARD USING FOR PAYMENT	
   	
CARD NUMBER	CVV2 CODE
SIGNATURE	EXP. DATE
STATEMENT DATE 07/05/2018	CURRENT AMOUNT DUE \$499.00
ACCOUNT NUMBER 01-002788113	\$ AMOUNT ENCLOSED



MICHAEL P GILBERT
614 ABERDEEN RD
CARY, IL 60013-2512

Make Checks Payable and Remit to:



Armor Systems Corporation
1700 Kiefer Drive, Suite 1
Zion, IL 60099-5105



☐ Please check box if above address is incorrect
and indicate change(s) on reverse side.

◀ DETACH UPPER PORTION AND RETURN WITH PAYMENT ▶

Creditor: COLLEGE OF LAKE COUNTY
Creditor Account #: 1005698
You Owe: \$499.00

YOUR REPLY IS REQUESTED

To determine future processing of your account(s), please tell us how you intend to resolve this debt(s).

Check one and return this form to us.

- () I intend to pay in full (See payment alternatives)
() I would like a payment plan if I qualify (Call Armor now)

Creditor Name(s)
VILLAGE OF ROUND LAKE PARK POLICE DEPT
COLLEGE OF LAKE COUNTY
Total Balance Owning

Amount
250.00
249.00
\$499.00

PAYMENT ALTERNATIVES

1. Money Order or Check (Return in enclosed envelope)
2. Pay online at pay.armorsys.com
3. Visa or MasterCard (Fill in information above and return)
4. Automated- Pay by phone (Call (800) 786-1895)

Please call #32 MARIA SANCHEZ at (800) 786-1895.

NOTICE

This is an attempt to collect a debt. Any information obtained will be used for that purpose. This notice is from a collection agency.

Name			Phone # ()
Address	City	State	Zip Code



EXHIBIT

B

09/12/13	140	CALL WITHOUT MY PERMISSIO DBTR SAID HE DON'T WANT	11:03	DARRYL
09/12/13	140	ANY CALLS FROM US	11:04	DARRYL
09/12/13	240	NO MORE CALLS DBTR SAID	11:05	DARRYL
09/12/13	811	SENT NOTICE	11:02	DARRYL
09/12/13		Cell Ph - 847 815-0301	11:05	DARRYL
09/12/13	140	RES-DBTR SZ NO MORE CALLS	11:03	DARRYL
09/12/13	240	T/POE-D SZ NO MORE CALLS	11:05	DARRYL
09/12/13		Close Code -	18:30	KATHY
09/12/13	610	I STOPPED THE NTC FROM GOING OUT-- NO NEED FOR ONE	18:33	KATHY
09/13/13		Returned mail flag to S	09:52	TIFFANY
09/19/13		Pri 002768687-002788113	09:34	NICOLEB
09/20/13	702	PREVIOUSLY SKIPTRACED	00:09	ISc
07/03/18	610	REMOVED DNC CODES- DTR GIVES PERM TO CALL AGAIN	12:01	ARGERENA
07/03/18	669	opx - ARG s669	12:01	***
07/03/18	811	SENT NOTICE	12:01	ARGERENA
07/06/18		City-ROUND LAKE BEACH	05:45	LLNCOA
07/06/18		State/Zip - IL 60013	05:45	LLNCOA
07/24/18	820	DTR CI- STATES CLIENT DISMISSED THIS TKT- CLAIMS W	11:32	ARGERENA
07/24/18	820	ENT TO COURT FOR 2768687-SD AROUND VETERAN'S DAY	11:32	ARGERENA

07/24/18	820	IN 2013 WHEN HE WENT TO COURT & TKT DISMISSED-	11:32	ARGERENA
07/24/18	820	PLS CONFIRM WITH VORLPPD	11:32	ARGERENA
07/24/18	820	Worker changed from 32	11:32	***
07/25/18	410	EMLD CLNT/CINDY	16:54	ARB2
07/25/18	410	EMAILED REQ TO CLIENT	16:54	ARB2
08/01/18	410	EMDL CLNT/CINDY, SHE EML RIGHT BACK-SHE WAS ON VAC	13:13	ARB2
08/01/18	410	A AND WILL LOOK INTO THIS	13:13	ARB2
08/01/18	410	EMAILED REQ TO CLIENT	13:13	ARB2
08/02/18	601	PER CLNT/CINDY SHE DOES NOT SEE ANY INDICATION THA	14:30	ARB2
08/02/18	601	T HE APPEARED IN COURT FOR THE VIOLATION. THE TICK	14:30	ARB2
08/02/18	601	ET WAS ISSUED 3/15/13, SO FOR HIM TO SAY HE WAS IN	14:30	ARB2
08/02/18	601	COURT IN NOVEMBER, SEEMS RATHER ODD-THEY HAVE ADJ	14:31	ARB2
08/02/18	601	UDICATION HEARINGS ONCE A MONTH, SO IF HE DID COME	14:31	ARB2
08/02/18	601	TO COURT IT SHOULD HAVE BEEN A MONTH OR TWO AFTER	14:31	ARB2
08/02/18	601	ISSUANCE NOT 8. UNLESS HE CAN PRODUCE PAPERWORK S	14:31	ARB2
08/02/18	601	TATING THIS HAPPENED, HIS FINE IS STILL OUTSTANDIN	14:31	ARB2
08/02/18	601	G AS FAR AS OUR RECORDS SHOW	14:31	ARB2
08/02/18	647	EMLD MARI	14:31	ARB2
08/02/18	601	Worker changed from 52	14:30	***

08/02/18	14	DELETED FOLLOW UP DATE	14:53	ARGERENA
08/14/18		Close Code -	13:44	ARTL
10/20/18	606	opx - 6 ARN s606-01	01:06	***
10/20/18	607	clx - ARN s607-01	01:06	***

01/08/18	Credit Reporting - ALL	16:53	ARTL
02/01/18	Credit Reporting - ALL	12:12	ARTL
03/01/18	Credit Reporting - ALL	09:29	ARTL
03/16/18	Credit Reporting - ALL	13:13	ARTL
03/30/18	Credit Reporting - ALL	15:59	ARTL
04/17/18	Credit Reporting - ALL	13:35	ARTL
05/01/18	Credit Reporting - ALL	13:43	ARTL
05/18/18	Credit Reporting - ALL	13:14	ARTL
06/01/18	Credit Reporting - ALL	13:39	ARTL
06/18/18	Credit Reporting - ALL	17:26	ARTL
07/02/18	Credit Reporting - ALL	10:01	ARTL
07/03/18	153 NASA CIR	11:59	ARGERENA
07/03/18	City-ROUND LAKE	11:59	ARGERENA
07/03/18	State/Zip - IL 600732844	11:59	ARGERENA
07/03/18	Cell Ph - 000-0000	11:59	ARGERENA
07/03/18	Auth.to call 847 815-0301	11:59	ARGERENA
07/03/18	City-CARRY	11:59	ARGERENA
07/03/18	Returned mail flag S to	11:59	ARGERENA
07/03/18	669 DTR CI OFF C/R- C#0301- GAVE PERM TO CALL HIM- UP	12:01	ARGERENA

07/03/18	669	DATED ADD- REQUESTED BAL LTR SO HE CAN START MAKIN	12:01	ARGERENA
07/03/18	669	G PMTS- EXPLAINED OPTIONS	12:01	ARGERENA
07/03/18	669	opx - ARG s669	12:01	***
07/03/18	669	CREDIT INFO GIVEN TO.....	12:01	ARGERENA
07/03/18	811	SENT NOTICE	12:01	ARGERENA
07/06/18		Ltr 10-Y-Mail w/USPS Addr	05:45	LLNCOA
07/06/18		State/Zip - IL 60013	05:45	LLNCOA
07/18/18		Credit Reporting - ALL	15:36	ARTL
07/24/18	22	CREDIT CALL TRANSFER TO MARI	11:28	ARGU
07/24/18	22	MOVE TO NEXT ACCOUNT	11:28	ARGU
07/24/18	669	DTR CI OFF BAL LTR- SAYS DOESN'T WANT TO PAY ON CL	11:33	ARGERENA
07/24/18	669	C ACCT YET NOR HAS ANYTHING TO 'SAY ABOUT IT'- ON	11:33	ARGERENA
07/24/18	669	THE TKT (LINKED), CLAIMS WAS DISMISSED IN COURT-	11:34	ARGERENA
07/24/18	669	SENT TO BETH TO VERF WITH CLIENT	11:34	ARGERENA
07/24/18	669	CREDIT INFO GIVEN TO.....	11:33	ARGERENA
07/25/18	410	EMLD CLNT/CINDY	16:51	ARB2
07/25/18	410	EMAILED REQ TO CLIENT	16:51	ARB2
08/01/18		Credit Reporting - ALL	11:22	ARTL
08/02/18	698	LMOC #0301	14:54	ARGERENA

08/02/18	14	DELETED FOLLOW UP DATE	14:53	ARGERENA
08/14/18		Returned mail flag to S	13:44	ARTL
08/14/18		Close Code -	13:45	ARTL
08/14/18	610	WE RCVD A LAWSUIT NTC ON THIS--SO PUTTING ACCT ON	13:45	ARTL
08/14/18	610	MAIL/DIALER HOLDS. PLS REFER DBTR TO HIS ATTY IF H	13:45	ARTL
08/14/18	610	E CALLS IN	13:45	ARTL
08/17/18		Credit Reporting - ALL	16:14	ARTL
09/04/18		Credit Reporting - ALL	17:18	ARTL
10/01/18		Credit Reporting - ALL	15:45	ARTL
10/20/18	606	opx - 6 ARN s606-01	01:06	***
10/20/18	607	clx - ARN s607-01	01:06	***
11/01/18		Credit Reported-WITHDRAWN	10:59	ARTL